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January 10, 2020

Via ECF

Hon. William H. Pauley
U.S. District Court, S.D.N.Y.
c/o United States Courthouse – Room 221
500 Pearl Street
New York, NY 10007

**Re: United States v. Michael Cohen
(18-cr-602 [W.H.P.])
(18-cr-852 [W.H.P.])**

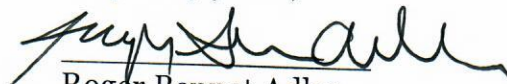
Dear Judge Pauley:

I respectfully write to Your Honor in the nature of an application pursuant to the Southern District Court's Electronic Case Filing Rules and Regulations Rule 6.1 to seek permission to file a single "Reply Affirmation" from co-counsel Michael Monico under seal. Mr. Monico's letter includes one exhibit (a March 20th, 2019 letter from his office to Assistant U.S. Attorney Thomas McKay), and a copy of referenced proffer notes. As you will note, Government counsel was provided with a copy of the application, and has consented, requesting that paragraph 4, and the first sentence of paragraph 5 be redacted. Mr. Monico's letter to Assistant U.S. Attorney McKay shall be appropriately redacted for public filing, and the supporting exhibits thereto sealed.

The reason for this application is to permit the filing of Michael Monico's Reply Affirmation discussing aspects of previously referenced proffer sessions containing information and details which involve third parties, and which, due to the pending of some of their cases, should not be in the public domain. There will, at minimum, be publicly filed Reply Affirmations from both (1) Michael D. Cohen, and (2) myself.

Against this backdrop, I do not discern any discernible prejudice to either the Court, or the United States Attorney's Office, should this application be granted.

Very truly yours,



Roger Bennet Adler

Attorney for Defendant Michael D. Cohen

RBA/gr

Cc:

Via email

Assistant U.S. Attorney Thomas McKay
c/o Acting United States Attorney Audrey Strauss